



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

AIR AND RADIATION DIVISION
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CHICAGO, IL 60604-3590

US EPA RECORDS CENTER REGION 5



471858

REPLY TO THE ATTENTION OF:
(AT-18J)

DATE: JAN 13 1994

SUBJECT: Review of the Draft Final Remedial Investigation Report for the Albion-Sheridan Township Landfill, Albion, Michigan

FROM: Jeanette Marrero, Environmental Engineer
Regulation Development Section
Air Toxics and Radiation Branch (AT-18J)

TO: Leah Evison, RPM
MI/WI Section
Remedial Response Branch (HSRW-6J)

THRU: Carlton Nash, Chief *CTW*
Regulation Development Section
Air Toxics and Radiation Branch (AT-18J)

This memo is in response to your request for comments on the Draft Final Remedial Investigation Report for the Albion-Sheridan Township Superfund Site dated December 16, 1993. I have reviewed the subject report and have the following comments:

- 1) Fugitive dust emissions can occur as a result of excavation or other soil handling procedures. These fugitive dust emissions may lead to a violation of the National Ambient Air Quality Standards (NAAQS). The NAAQS for particulate matter (PM) is specified in 40 CFR Part 50. The NAAQS for PM with an aerodynamic diameter equal to or less than 10 micrometers is 150 $\mu\text{g}/\text{m}^3$ in a 24-hour average with no more than one expected exceedance per year. The annual PM standard is 50 $\mu\text{g}/\text{m}^3$ (annual arithmetic mean).
- 2) A proposed New Source Performance Standard for municipal solid waste landfills (May 30, 1991, 56 FR 24468) will establish three control options for landfill vent gases. The three control options are: installation of a control device, installation of a flare that meets operating requirements in 40 CFR 60.18, and the collection of landfill gas for later use or resale.
- 3) Section 300.430 (d) (2) (ii) of the National Oil Hazardous Substances Pollution Contingency Plan requires the air pathway be evaluated through the baseline risk assessment. To conduct the baseline risk assessment, the Office of Solid Waste and Emergency Response document entitled, Supplemental Guidance to RAGS: Calculating the Concentration Term, should be utilized.

- 4) New preparatory procedures have been developed by the U.S. EPA Office of Solid Waste and Emergency Response. Specifically, Method 5035, Modified Purged-and-Trap and Extraction for Volatile Organics in Soil and Waste Samples, describes improved procedures of analyzing soil for volatile organic compounds. The sample in this method is never exposed to the atmosphere after sampling, therefore making the loss of VOC negligible. Please refer to this method whenever planning soil sampling procedures in the future.

Thank you for the opportunity to review and comment on this document. If you have any inquiries, please contact me at 886-6543.